

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION 7

SITE NAME: Comanche Construction

EPA ID#: Not yet assigned

KDHE ID#: C4-046-73082

Alias Site Names:

City: Olathe

County or Parish: Johnson

State: Kansas

Refer to Report Dated: June 2014

Report type: Preliminary Assessment (PA)

Report developed by: Kansas Department of Health and Environment/Bureau of Environmental Remediation (KDHE/BER)

DECISION: A significant release of hazardous substances, pollutants or contaminants was not identified at this site. Further enforcement actions will be taken by KDHE through the Bureau of Waste Management under the Resource Conservation and Recovery Act (RCRA).

DISCUSSION/RATIONALE: The Comanche Construction site includes the office and lot of a commercial construction company in Olathe, Johnson County, Kansas. A Northeast District Office (NEDO) complaint investigation in March 2013 identified multiple RCRA violations, and the Site Assessment Unit was requested to conduct sampling to determine if soil and groundwater were impacted by releases from the facility.

During the PA 11 on-site locations and one background location were sampled using KDHE's Geoprobe unit. Continuous samples were taken to refusal in areas identified by the NEDO inspector as having potential container or drum storage. An additional five temporary wells were also attempted with KDHE's Mobile Drill B-3300 auger drill rig.

One detection of benzene was observed above its Maximum Contaminant Level (MCL) but was not repeated in resampling of the same temporary well. Lead was detected above its three times background concentration in the paint sample but below its residential Tier 2 Risk-based Standards for Kansas (RSK) concentration. Chromium was detected above its residential Tier 2 RSK in several samples including the background sample, but was not detected above a three times background level in any on-site sample. 1,1-dichloroethane was detected below its RSK level in groundwater in one sample.

From the PA results, a significant release of hazardous substances, pollutants, or contaminants does not appear to be present at the Comanche Construction site. Hazardous waste compliance issues will be addressed by KDHE's Bureau of Waste Management. Since this site has been referred for further enforcement under RCRA, no further site assessment consistent with the National Oil and Hazardous Substances Pollution Contingency Plan is recommended (NFRAP-deferred to RCRA).

Report Reviewed and

Approved by: Randolph L. Brown, P.G., KDHE/BER Signature:  Date: 06/27/14

Site Decision Concurrence

Made by: Paul Roerman, Kansas SAM, EPA SUPR/ER&R Signature: _____ Date: _____

PRELIMINARY ASSESSMENT (PA) CHECKLIST

This checklist can be used to help determine if additional response beyond the PA is warranted. This checklist should summarize the rationale for the decision if additional assessment or response is required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Randolph L. Brown, P.G., Site Assessment Unit Chief 05/06/2014
Name/Title Date

1000 SW Jackson, Suite 410, Topeka, Kansas 66612 785.296.8065
Address Phone

rbrown@kdheks.gov
E-Mail Address

Site Name and CERCLIS I.D.: Comanche Construction

Previous Names or Alias:

State I.D.: C4-046-73082

Site Location: 16510 West 119th Street, Olathe, Kansas 66061

Latitude: 38.91372

Longitude: -94.77722

Describe the release (or potential release) and its probable nature: Potential release of heavy metals, volatile organic compounds and petroleum hydrocarbons in commercial construction company yard.

Part 1 - Superfund Eligibility Evaluation

	YES	NO
1. Is the site currently in CERCLIS or an "alias" of another site?		X
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?	X	
3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?		X
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?		X
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, previous HRS score determined, or an EPA approved risk assessment completed)?		X

Please explain all "yes" answer(s). A significant release of hazardous substances, pollutants or contaminants was not identified at this site during the PA. Subsequent enforcement actions are being conducted under the Resource Conservation and Recovery Act.

Part 2 - Site Evaluation

	YES	NO
Does documentation indicate that a target (e.g. drinking water wells, drinking surface water intakes, etc.) at or adjacent to the site has been exposed or potentially exposed to a hazardous substance, pollutant or contaminant released from the site?		X
Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby actual or potential targets (e.g., targets within 1 mile)?		X
Does the site lack documented on-site, adjacent, or nearby targets?		X
Does the site lack releases or potential to release of hazardous substances, pollutants or contaminants?		X

Please explain all "yes" answer(s). While lead was detected above background concentrations, it is not elevated above residential RSKs. VOCs were not repeatedly detected above MCLs or RSKs. This site is recommended for NFRAP and RCRA referral..

Part 3 - EPA Site Assessment Decision

Check the box that applies based on the conclusions of the PA:

☒ **NFRAP**

- ☐ Higher Priority SI
☐ Lower Priority SI
☐ Defer to RCRA Subtitle C
☐ Defer to NRC
☐ Refer to Removal Program - further site assessment needed
☐ Refer to Removal Program - NFRAP
☐ Site is being addressed as part of another CERCLIS site
☐ Site is being addressed by a State program (specify program): _____
☐ Other: _____

KDHE Reviewer: Randolph L. Brown, P.G.
Name/Signature



06/27/2011
Date

June 27, 2014

Mr. Paul Roemerman
U.S. EPA Region VII, Superfund Division
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Preliminary Assessment and QuickScore for the Comanche Construction Site, Olathe, Johnson County, Kansas
KDHE I.D. # C4-046-73082
EPA I.D. # Not yet assigned

Dear Mr. Roemerman:

The Kansas Department of Health and Environment (KDHE) has completed the Preliminary Assessment (PA) of the Comanche Construction site in Olathe, Johnson County, Kansas. The samples collected during the PA do not indicate a significant release of hazardous substances, pollutants, or contaminants to soil or groundwater at the site. At this time KDHE is recommending no further site assessment (NFRAP) consistent with the National Oil and Hazardous Substances Pollution Contingency Plan. The hazardous waste compliance issues are being addressed through KDHE's Bureau of Waste Management. If you have any questions, please feel free to contact me at (785) 296-8065.

Sincerely,



Randolph L. Brown, P.G.
Unit Chief, Site Assessment Unit
Assessment and Restoration Section
Bureau of Environmental Remediation

rlb/Attachments

c: **Site File -> C4-046-73082 8.1**
Site Decision Files
Nancy Ulrich (letter only)
Rebecca Wenner (letter only)